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Article:

Esmail, Nafeesa, Wintle, Bonnie C, 't Sas-Rolfes, Michael et al. (22 more authors)
(Accepted: 2020) *Emerging illegal wildlife trade issues : a global horizon scan*.
Conservation Letters. ISSN 1755-263X (In Press)

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Emerging illegal wildlife trade issues: a global horizon scan

Journal:	<i>Conservation Letters</i>
Manuscript ID	CONL-19-0089.R3
Wiley - Manuscript type:	Letters
Date Submitted by the Author:	n/a
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Keywords:	Africa, conservation, expanding trade networks, global policy trends, Latin America, misinformation, online platforms, strategic foresight, wildlife trafficking, East Asia
Abstract:	Illegal wildlife trade is gaining prominence as a threat to biodiversity, but addressing it remains challenging. To help inform proactive policy responses in the face of uncertainty, in 2018 we conducted a horizon scan of significant emerging issues. We built upon existing iterative

	<p>horizon scanning methods, using an open and global participatory approach to evaluate and rank issues from a diverse range of sources. Prioritised issues related to three themes: developments in biological, information and financial technologies; changing trends in demand and information; and socio-economic and geopolitical shifts and influences. The issues covered areas ranging from changing demographic and economic factors to innovations in technology and communications that affect IWT markets globally; the top three issues related to China, illustrating its vital role in tackling emerging threats. This analysis can support national governments, international bodies, researchers and non-governmental organisations as they develop strategies for addressing the illegal wildlife trade.</p>

Title: Emerging illegal wildlife trade issues: a global horizon scan

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Abbreviated form of title: Horizon scan for illegal wildlife trade

Keywords:

1. Africa
2. conservation
3. East Asia
4. expanding trade networks
5. global policy trends
6. Latin America
7. misinformation
8. online platforms
9. strategic foresight
10. wildlife trafficking

Type of article: *Letters***Number of words in the abstract:** 149**Number of words in the manuscript:** 3,271**Number of references:** 40**Number of figures and tables:** 3**Corresponding name and complete mailing address:**

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For Peer Review

72 **Abstract:**

73 Illegal wildlife trade is gaining prominence as a threat to biodiversity, but addressing it
74 remains challenging. To help inform proactive policy responses in the face of
75 uncertainty, in 2018 we conducted a horizon scan of significant emerging issues. We
76 built upon existing iterative horizon scanning methods, using an open and global
77 participatory approach to evaluate and rank issues from a diverse range of sources.
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79 financial technologies; changing trends in demand and information; and socio-economic
80 and geopolitical shifts and influences. The issues covered areas ranging from changing
81 demographic and economic factors to innovations in technology and communications
82 that affect IWT markets globally; the top three issues related to China, illustrating its vital
83 role in tackling emerging threats. This analysis can support national governments,
84 international bodies, researchers and non-governmental organisations as they develop
85 strategies for addressing the illegal wildlife trade.

86 **Introduction:**

87 Thousands of species are subject to illegal wildlife trade (IWT), defined here as the
88 unlawful buying or selling of harvested wild species (or derivatives; 't Sas Rolfes et al.
89 2019). Due to its complexity and typically covert nature, the absolute scale and value of
90 IWT is challenging to assess, but estimates place it in the top five illegal transnational
91 trades, alongside arms and drugs. (UNODC, 2016; van Uhm, 2016). Impacts extend
92 beyond biodiversity, as criminal involvement may destabilize governments and
93 economies (Felbab-Brown, 2017) and damage livelihoods and security for those living
94 with wildlife (Riskas et al., 2018). However, IWT also provides income to individuals with
95 limited alternatives (Harrison et al., 2015) and valued goods, such as bushmeat, to
96 consumers (Boratto & Gore, 2018).

97
98 Whilst predicting and responding to IWT is challenging, there are growing opportunities
99 to influence global and national policies. For example, in 2015, the UN General Assembly
100 adopted its first wildlife trafficking resolutions (UNGA, 2015). In 2014-18, the UK
101 government led a series of four international conferences and one regional event,
102 specifically aimed at addressing the topic. At the Convention on Biological Diversity's
103 thirteenth Conference of the Parties, a decision was made to provide technical guidance
104 towards a more sustainable bushmeat sector. The direct exploitation of organisms,
105 including illegal extraction to meet local and global markets, was ranked second of five
106 key drivers of harmful ecosystem change in the Intergovernmental Science-Policy
107 Platform on Biodiversity and Ecosystem Services' first global assessment (IPBES 2019).

108

109 Global IWT policy-making involves a range of stakeholders, operating within and
110 between systems of varying compatibility. Currently, member state compliance with
111 international agreements, such as CITES (the Convention on International Trade in
112 Endangered Species of Wild Fauna and Flora), provides the dominant means for
113 governing wildlife trade to ensure it does not threaten species (’t Sas-Rolfes et al, 2019).
114 Increasing attention has recently focused on transnational organised crime and related
115 security dimensions, broadening the scope of IWT policy and action to involve bodies
116 such as the UN Security Council, Interpol, and the United Nations Office on Drugs and
117 Crime (UNODC). Regional and global policy initiatives focus on enforcement, technical
118 assistance, and capacity building, yet effective counter-IWT measures hinge on the
119 political will of nation states. Such a multifaceted policy-making environment requires
120 proactive approaches informed by interdisciplinary input, leveraging relevant
121 innovations in technology, governance and information systems.

122

123 IWT is often unpredictable, involving fluid markets and clandestine crime. In this
124 complex landscape, appropriate policy responses should be informed by empirical
125 evidence. While some trends in the *legal* wildlife trade are relatively well-documented
126 (Harfoot et al., 2018), little has been done to analyse IWT trends and patterns
127 systematically. Proxy measures of IWT, such as seizure data (Rosen & Smith, 2010),
128 provide some indication of trade routes and scale, but contain detection and reporting
129 biases (Underwood et al., 2013). Seizures tend to be biased towards charismatic

megafauna (e.g., elephant ivory) and may constitute less than 10% of all illegal trade (van Uhm, 2016). Information linked to underlying drivers and trends shaping IWT is even more difficult to obtain. In the face of such uncertainty, poorly informed public responses may drive politically popular, but ultimately counterproductive, policy measures.

This first global horizon scan of IWT aims to inform proactive policy responses by governments, international conventions and NGOs to prioritise key IWT issues, underpinned by emerging empirical evidence. Horizon scanning is particularly useful for gathering, organising and prioritising new and existing evidence about emerging issues in a timely, structured and transparent way (Wintle et al, In press). It can be used for policy and decision-making alongside other strategic foresight tools, such as scenario planning (Cook et al., 2014).

Horizon scanning systematically searches diverse information streams (Amanatidou et al., 2012), and identifies emerging threats and opportunities (Sutherland & Woodroof, 2009). By helping understand system dynamics and anticipate the future, horizon scanning can support better coordination of resources, responsive policy or on-the-ground action to address issues before full impacts are realised (Konkola et al., 2012). The policy impact of horizon scanning exercises is challenging to gauge, because decisions typically reflect a blend of inputs (Wintle et al., In press). Nonetheless, other horizon scans have set a precedent of informing policy and decisions. For example,

priorities identified in an Antarctic Science Horizon Scan (Kennicutt et al., 2014) were used to invoke financial support for joint science programmes on ice sheet research (National Science Foundation, 2016), and issues identified in annual global conservation scans (e.g. Sutherland et al., 2018) have informed the U.K.'s Natural Environment Research Council's 'Forward Look' strategic planning.

Scans for global conservation issues have been conducted for ten years (e.g., Sutherland et al., 2018) and topics thus identified have had widespread salience. Illustrating this, in 2009, only 23% of respondents had heard of microplastic pollution, 46% of synthetic meat, and 69% of mobile sensing technology; today, these are mainstream issues (Sutherland et al., 2019). Our horizon scan provides insights into how complex economic, socio-political, financial, and ecological systems relate to IWT. Building on existing structured methods, but using an open and inclusive approach to participation, it highlights a diverse range of emerging topics to consider when formulating policy and coordinating resources.

Methods:

We adapted the Delphi-like method used in other horizon scans (Mukherjee et al., 2015; Sutherland et al., 2018). Through anonymity, iteration, facilitated discussion, structured elicitation, and aggregation of individual judgments, the method is designed to democratically incorporate a range of perspectives, and mitigate psychological biases that typically befall individuals and groups (Burgman, 2016).

174

175 Many scans solicit direct input from an invited expert group and require participants to
176 meet in person. There is always a risk that particular topics may be more likely to be
177 suggested when they closely align with the person's own research interests, and that
178 more senior people, seen as "experts", may have particular worldviews and experiences,
179 that limit their perspectives. To help mitigate this potential source of bias, we cast a
180 wide net to solicit the first round of ideas from as many different contributors as
181 possible, to capture diverse interests from around the world. To do so, we used an open
182 online platform, which accommodated 29 languages and remotely engaged
183 contributors who might not otherwise be able to participate (Hemming et al., 2017;
184 McBride et al., 2012). An online call for participation was disseminated via targeted
185 individuals and approximately 45 networks, groups and organisations, encompassing a
186 range of relevant disciplines and institution types. The call reached a minimum of 5,000
187 people. Supplementary Material 1 provides specific methodological details.

188

189 The study followed a stepwise procedure, with all stages remotely facilitated, to identify
190 and prioritise emerging issues with the potential to have substantial positive and/or
191 negative impacts on IWT over the next 5-10 years (Figure 1). Ultimately the usefulness
192 of Horizon Scanning can only be judged retrospectively based on whether the issues
193 have come to pass within the specified time-frame and how the scan has informed
194 proactive responses (Sutherland et al. 2019).

195

<Figure 1>

Up to five issues were elicited from each contributor (**Stage 1**), who were asked to think widely, consult their networks, and conduct their own research. Thirty-nine nationalities and wide expertise (including biomedical engineering, conservation, criminology, earth sciences, ecology, economics, geography, law, political science and sociology) were represented in the initial contributor group (139 individuals). Eighty-seven percent of contributors were affiliated with institutions. Of those, sixty-five percent were affiliated with academia, 50% NGOs, 17% consultancy, 13% government, 10% multilateral organisations, and 7% private sector. Contributors worked in multiple regions: 55% Africa, 50% Asia-Pacific, 26% Europe, 17% North America, 11% Latin America.

The initial list was thematically organised and anonymised by the facilitators (NE, BW). Unsuitable material (which conveyed a perceived need, knowledge gap, opinion or promotion) was removed. A consolidated list was circulated to 'assessors', a subset of contributors who had submitted well-researched contributions accompanied by links to evidence (i.e. papers, reports etc.), chosen to balance background, expertise and geographical diversity (the remaining authors). Six of 139 people submitted issues in a language other than English; among the 25 authors there was fluency in at least 10 languages, allowing evidence from a range of sources to be assessed.

217 In **Stage 2**, the assessors independently and anonymously scored (on a scale of 0-1000)
218 each issue based on novelty, plausibility, and potential future impact on IWT. Raw scores
219 were converted to z-scores, ranked (Wintle et al., 2017), and the top 45 were shortlisted.
220 Assessors reported whether they had previously heard of each issue; the least known
221 reflecting some of the most novel issues. Before **Stage 3**, the opportunity was given to
222 'save' any of the originally assessed 128 issues not shortlisted through scoring, if
223 substantiated with well-justified reasoning. Eight additional issues were saved, meaning
224 53 issues moved to **Stage 3**. Here, each assessor was randomly assigned 4-5 issues to
225 investigate, ensuring that each issue was closely examined by 2-3 people and equally
226 considered before discussion. This helped mitigate potential biases from people
227 focussing solely on their own 'pet' topics, or eye-catching topics. In **Stage 4**, authors
228 discussed insights into each issue from their investigations and experiences via an online
229 forum. This culminated with a second scoring round to produce a final ranked list of 20.
230 Again, scoring was independently completed by each assessor with scores aggregated,
231 so decisions on the final list were not dominated by the loudest voice. The facilitators
232 then reworked final issue descriptions and grouped them into overarching themes. We
233 cross-validated these groupings and links between themes by conducting topic
234 modelling, based on the descriptive text, using Latent Dirichlet Allocation (Blei et al.,
235 2003; Supplementary Material 4). To clarify the policy relevance of issues and refine their
236 descriptions, we drew upon issue-specific expertise from an additional 12 external
237 reviewers (Stage 5).

238

Results:

The top 20 issues fell under three overarching themes: (i) *Geographic (political, demographic and socio-economic) shifts and influences*; (ii) *Scientific and technological innovation*, and (iii) *Changing trends in demand and information* (Fig. 2). Topics identified through the Latent Dirichlet Allocation analysis largely complemented our qualitative analysis of overarching themes; results are presented in Supplementary Material 4. In Supplementary Material 2, we provide details of the top 20 issues, with brief descriptions of the following 40. Policy directions are mapped out for all top issues in Supplementary Material 3, intended as a platform for further discussion and decision-making.

<Figure 2>

Issues under the first theme, '*Geographic shifts and influences*' include changing geopolitical processes and the rising global influence of East Asia. Authors noted political, demographic and economical changes, which could facilitate greater access to wildlife, and stimulate growing demand (but also sustainable opportunities) for IWT products. These issues were the top three ranked: **Issue 1**- the political support and cultural revival of Traditional Chinese Medicine (Zheng, 2016; Table 1); **Issue 2**- the increasing role of China in developing countries, through international aid, investment, and diaspora; and **Issue 3**- the rapid expansion of new international trade routes,

particularly in the context of the Belt and Road Initiative (Chinese State Information Centre, 2019).

<Table 1>

In key wildlife source countries, especially in Africa and Latin America, recent developments create conditions that may exacerbate IWT. This includes freer trade and migration policies, with aspirations for rapid economic growth and prosperity across Africa (African Union, 2018; **Issue 7**). Rapid human population growth, alongside continued agricultural land conversion and natural habitat encroachment, also affects sub-Saharan Africa (**Issue 8**), leading to increased human-wildlife conflict, resource pressure, and wildlife crime (Kideghesho, 2016). Indicated by expanding Asian-influenced demand for its range of commodities and species, Latin America was also considered increasingly prominent in IWT activities, with trade often passing undetected through established smuggling routes (Issue 20). Political and socio-economic instability in the region was highlighted, with the current crisis in Venezuela identified as a significant potential catalyst for IWT, facilitating both extraction and transit (Sánchez-Mercado, 2017) and impacting neighbouring countries (Issue 9).

Issues under the second theme, '*Scientific and technological innovation*', fell into two broad categories: 1) biotechnology and 2) information technology (IT), including financial technology. The most highly-ranked biotechnology issue was **Issue 4**: genetic

technological advancements (e.g. Parker et al., 2018), enabling rapid, cost-effective assessments and traceability of product identity and source at the species and individual levels. Such advances can provide critical evidence to penalise and deter wildlife traffickers. Increased availability of portable devices also offers the potential to increase legal trade monitoring.

Three recent IT developments were deemed significant. **Issue 17** concerns the shift of IWT operations and transactions onto and between digital platforms, such as closed social media groups (Xiao et al., 2017), with trade aided by the convergence of online and mobile payment systems, and cryptocurrencies (**Issue 12**). Both reflect the increasing exploitation of digital platforms for advertising and IWT-related transactions, by sellers and buyers. Closely related is **Issue 13**: the role of social media as a marketplace and forum that can either stimulate or deter IWT (e.g. Nekaris et al., 2013). Relatedly, **Issue 16** highlights the emerging use of financial analysis and investigation tools to help track and disrupt IWT-related transactions (Haenlein & Keatinge, 2017), enabling law enforcement to incorporate this into their broader IWT responses.

Our third theme, *'Changing trends in demand and information'*, encompasses a range of issues around specific products and markets. Markets for certain taxa and wildlife-derived products are growing, with threats underappreciated. These include demand for *Haiwei*, dried seafood (**Issue 10**), medicinal plants (**Issue 19**) and cave beetles in Eastern Europe's karst landscapes (**Issue 18**) which are at risk of extinction before being

scientifically described. **Issue 14** highlights the general concern that newly discovered species (desired by collectors for their novelty) may quickly become targets due to easier-to-access locational information (Lindenmayer & Scheele, 2017).

Linked to themes two and three, public-private collaborations help identify and disrupt illicit financial flows by using financial institutions' anti-money laundering technology and infrastructure, and information exchange to facilitate investigations and prosecutions (**Issue 15**, APG & UNODC, 2017). Another cross-thematic issue is that, in the modern age of networked communication, misinformation (from market participants, intergovernmental bodies, NGOs, policymakers and/or the media) can rapidly influence policy and practice (**Issue 5**). This can be difficult to correct and can undermine conservation efforts by skewing policy responses and potentially misdirecting scarce resources.

Finally, and linking back to our first theme, two additional cross-thematic issues were identified. **Issue 6** highlights how urbanisation (across Africa and Asia) may change the dynamics of wild meat markets (Boratto & Gore, 2018). As supplies diminish and restrictions on harvesting certain species intensify, substitutes for wildlife products (such as tiger parts, timber, orchids) are increasingly sought, with globalisation facilitating this shift towards analogue species (**Issue 11**).

Discussion:

Through an inclusive and democratic horizon scanning strategy, we prioritised 20 issues, from which three interlinked themes emerged. Many are double-edged; for instance, a more networked world allows both illegal traders and conservationists to form new alliances and influence public opinion and behaviour. Rapidly emerging technologies are changing the speed and ways people react to newly opened markets and information sources. In particular, the growing reach of mobile technology and physical access into new areas (including remote rural and marine locations) presents opportunities for both IWT perpetrators and conservationists. This dynamic IWT environment presents a challenge as mitigation efforts are inherently reactive to trafficking activities and thwarted by jurisdictional boundaries.

Many issues relate to changing social, economic, political and governance regimes, with the potential to both enable and limit IWT. Major initiatives, such as China's Belt and Road Initiative and African economic growth strategies, may bring prosperity but also biodiversity loss. A number of issues (relating to agricultural conversion, urbanisation, TCM promotion, East Asia's influencing role, African growth strategies, skewed African demographics towards younger people and a rising Asian middle-class) circle back to underlying topics of human population growth and overconsumption; major and contentious causes of current and future conservation challenges.

347 Given a key aim of addressing IWT is to conserve biodiversity (IPBES, 2019), a broader
348 perspective is needed, requiring integrated responses across sectors. Policy and funding
349 currently tend to focus on large, charismatic species, predominantly traded from Africa
350 to Asia, with wider ecological values sometimes overlooked. Additionally, it can be
351 difficult to predict which species and areas will become the next targets, especially if
352 they are lesser known. Of the taxonomically-focused issues captured, we prioritised
353 those we believed to be most neglected in IWT discourse (i.e. cave invertebrates,
354 medicinal plants, *Haiwei*, seabirds), while acknowledging prioritising one taxon over
355 another is a value judgment. We also recognise that the issues identified were informed
356 by the expertise of scan participants, who were predominantly sourced through the
357 Oxford Martin Programme on the Illegal Wildlife Trade mailing list. A different group of
358 people might have identified and prioritised different specific issues. Similarly, limiting
359 participants to those with more horizon scanning experience might have yielded a
360 different balance between issues that are truly novel and those that are already well-
361 evidenced. However, this would have reduced contributor diversity, thereby potentially
362 also limiting the range of issues considered. This doesn't negate the issues selected, but
363 highlights the need for regular scans and wide consultation. Future scans should
364 incorporate all relevant voices even more actively, ensuring local community
365 perspectives are heard as well as those sourced through international-level processes.
366
367 IWT dialogues are often perceived as 'western'-led. But as local and national voices seek
368 more authority over natural patrimony, sovereignty and self-determination, this is

changing. Notably, our scan identifies greater commitment to tackling IWT from African political leaders, particularly through peer-to-peer dialogues (**Issue 34**) and initiatives that support recognition of and engagement with local communities (**Issue 38**).

Furthermore, the pivotal role of China in tackling IWT is highlighted. However, expanding demand for wildlife products due to rising prosperity is not unique to China and its neighbours. Future agendas for tackling IWT would benefit from coordinated efforts linking major centres of supply, demand and trade across the world.

Many issues cut across several policy arenas and stakeholders. Conducting in-depth stakeholder and policy-gap analyses for each issue can highlight those in need of cross-sectoral input and help inform appropriate action, by identifying other relevant individuals, groups, policies or legislation, considering their relationships, and prioritising their involvement in the decision-making process (see Supplementary Material 3 as a starting point). It would also be useful to further 'roadmap' the path to a *particular* policy impact by carrying out feasibility assessments of different options, informed by filling necessary knowledge gaps. Techniques to support evidence-based decision-making in uncertain conditions (e.g. scenario planning) can also assist in assessing the most relevant possible futures and policies.

Our findings underpin policy briefing documents, presented at the 2018 London IWT Conference and the 18th CITES Conference of the Parties in August 2019 (Esmail et al., 2019). This scan might be similarly useful to large-scale funders (such as governments and

international NGOs) as a guide for prioritising strategic funding programmes, and for highlighting issues to raise during inter-governmental discussions on strategic approaches to tackling IWT. We recommend regular systematic IWT horizon scanning, both nationally and globally, as a pro-active management tool to detect issues before they become urgent, ubiquitous, and thus unmanageable. This could be integrated into strategic planning by donors, regulatory bodies and international partnerships addressing transnational crime, to better coordinate resources and interventions, pre-emptively addressing challenges while solutions are achievable. We hope that future-orientated exercises such as this may help conservation shift its focus from responding to crises to preparing for what is to come.

Acknowledgements and Data:

We thank all those involved in this project (see Supplementary Material 5 for complete contributor lists). Special thanks to the numerous external reviewers who contributed at various stages, including peer-review. We gratefully acknowledge the financial support of the Oxford Martin Programme on the Illegal Wildlife Trade. WJS is funded by Arcadia. Research ethical approval was received from the University of Oxford (CUREC 1A Approval Ref: R56377/RE001).

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573 *Figure 1: Methodological stages illustrating the number of people involved and treatment of issues*
574 *at each stage. Assessors and facilitators are the paper's authors.*

575

576 *Figure 2: The top 20 issues with linkages drawn between them. Numbering represents the rank*
577 *order of the issues. Those outlined in black are cross-thematic issues. See Supplementary*
578 *Material 2 for descriptions of all issues.*

579

580 *Table 1: Policy relevance of issue 1, as an example of how the issues can be related to policy. Other*
581 *issues are discussed in Supplementary Material 3.*

582

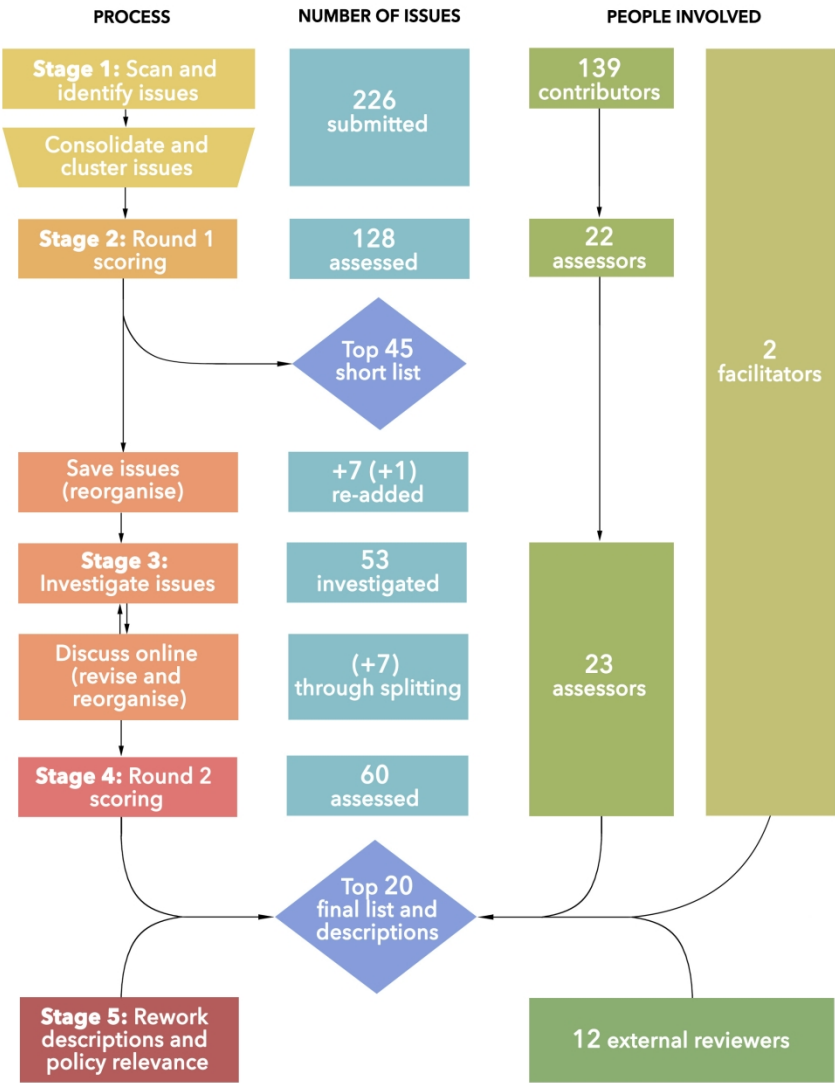


Figure 1: Methodological stages illustrating the number of people involved and treatment of issues at each stage. Assessors and facilitators are the paper's authors.

196x250mm (300 x 300 DPI)

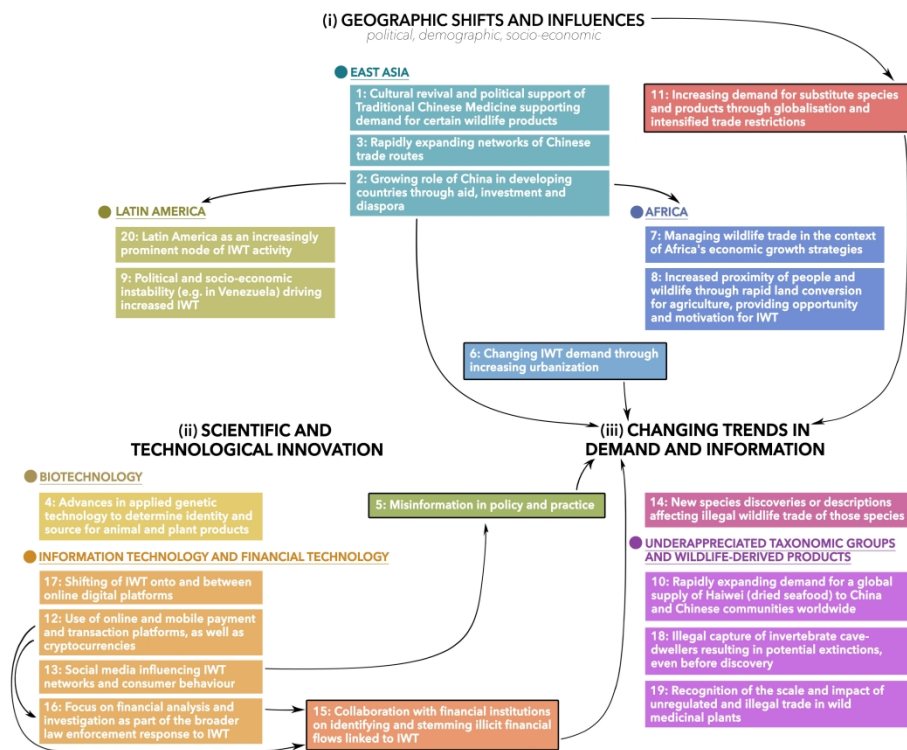


Figure 2: The top 20 issues with linkages drawn between them. Numbering represents the rank order of the issues. Those outlined in black are cross-thematic issues. See Supplementary Material 2 for descriptions of all issues.

365x307mm (300 x 300 DPI)

Table 1: Policy perspective of the top ranked horizon scan issue. This table is not exhaustive, (e.g. it largely omits local and national processes and stakeholders) but represents a starting point to inform policy and management and guide strategic responses. See Supplementary Material 3 for Acronym List and perspectives for other issues.

1: Cultural revival and political support of Traditional Chinese Medicine supporting demand for certain wildlife products			
Current policy context	Relevant actors and institutions: stakeholders to consider	Knowledge gaps	Potential policy and management approaches: ideas for discussion
<p>Section 4.2 of Traditional Chinese Medicine Could Make ‘Health for One’ True, states: “In order to ensure sustainable supplies of natural produce, planting and farming endangered species of wildlife are encouraged by the government, community, and the international organization.”¹</p> <p>Strategic objective 1 of WHO Traditional Medicine Strategy, states: “Member States should strengthen their own knowledge generation, collaboration and sustainable use of T&CM resources. It is important that Member States and stakeholders are mindful</p>	<p>TCM associations (e.g. China’s National Administration of TCM), regional hospitals and local medicinal marketplaces.</p> <p>Pharmaceutical industries and TCM education sectors.</p> <p>National and regional pharmaceutical market and labeling regulators (e.g. State Administration for</p>	<p>What pharmacopoeia is being promoted?</p> <p>Where do the wildlife-related ingredients for the medicines in the pharmacopoeia originate?</p> <p>How are these ingredients currently sourced?</p> <p>Are these ingredients</p>	<p>Implement evidence-based regulation of unsustainably sourced products (alongside monitoring of medicines over a certain quantity).</p> <p>Raise awareness of all stakeholders of issues of biodiversity and conservation. Conduct targeted consumer / practitioner behaviour change interventions.</p> <p>Create an open-access online platform to integrate policy</p>

¹ World Health Organisation Commission on Intellectual Property Rights, Innovation and Public Health. Traditional Chinese Medicine Could Make ‘Health for One’ True, 2007. Retrieved from: <https://www.who.int/intellectualproperty/studies/jia.pdf>

<p>of biodiversity and international treaties concerning endangered species.”²</p> <p>China's National Regulation on Protection of Wild Medicinal Resources (1987), Law of the People's Republic of China on TCM (2017), Pharmaceutical Administration Law of the People's Republic of China (2015 Amendment).</p> <p>Existing CITES measures to regulate trade of wildlife products derived from listed species.</p> <p>SDG 3: Good Health and Well-being (However there is no mention of traditional medicines).</p>	<p>Market Regulation).</p> <p>National importation regulators, CITES management authorities and customs agencies.</p> <p>International development agencies, multilaterals and intergovernmental bodies (e.g. WB, WTO, WHO, FAO, UNDP, UNEP).</p> <p>General public, particularly users/consumers.</p>	<p>sustainable now? In the future, given predicted demand?</p> <p>What acceptable substitutes exist for unsustainable ingredients?</p> <p>Will TCM practitioners adhere to the pharmacopoeia? If not, what other species may be affected?</p>	<p>transparency and accountability.³</p> <p>Integrate issue into intergovernmental regulatory platforms and institutions (e.g. FAO food safety regulations; WHO pharmaceutical safety regulations).</p> <p>Strengthen control and screening at customs ports. Particularly because TCM may expand rapidly outside of China due to the BRI and other similar plans.</p>
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² World Health Organisation. WHO Traditional Medicine Strategy: 2014-2023, 2013. Retrieved from: <https://apps.who.int/iris/handle/10665/92455>

³ See the Institute for Policy Integrity Government Transparency and Accountability project, as an example: <https://policyintegrity.org/projects/transparency-and-accountability>